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November 23, 2020

VIA ECF

Hon. Victor Marrero, U.S.D.J.
U.S. District Court, S.D.N.Y., Part 1
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *E.G., individually and as parent and natural guardian of A.I. and L.I., minor children, et al. v. The City of New York et al.; No. 1:20-cv-09879*

Request for Sealing of Unredacted Filing

Dear Judge Marrero:

We represent Plaintiffs in the above-captioned action, and direct this correspondence to Your Honor as Part 1 Judge of this Court. Plaintiffs respectfully seek permission to file under seal an unredacted version of Exhibit H to the Declaration of Grant R. Mainland in Support of Plaintiffs' Motion for a Preliminary Injunction, filed contemporaneously herewith. Exhibit H was filed in redacted form to protect the confidential, nonpublic addresses of certain domestic violence shelters in New York City. In providing this information to Plaintiffs' counsel, the General Counsel of Defendant DSS requested that it be treated confidentially—a request that appears well-justified given the nature of the information to be protected, and well-supported by the governing legal standards. *See, e.g., Brown v. Maxwell*, 929 F.3d 41, 49 (2d Cir. 2019) (judicial documents subject to the right of public access are those that are “relevant,” “useful,” and have a “tendency to influence a district court’s ruling on a motion”).

Respectfully Submitted,

/s/ Grant R. Mainland

Grant R. Mainland

cc: Counsel to All Parties (via email)

MILBANK LLP

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